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Barbara Fergusson

From: Mike Bush <bmoc54@verizon.net>
Sent: Wednesday, December 14, 2022 11:02 AM
To: John Davis
Cc: Barbara Fergusson
Subject: Initial disclosures
Attachments: Initial Disclosures 2022-12-14.pdf

Hi John,

I hope this message finds you well.

Regarding the Bush v. Acton Boxborough School District et al case:

I have attached my initial disclosures. Please provide your clients'.

I see that we have not met Federal Rule of Civil Procedure 26(f)(1)'s requirement to confer "as soon as practicable" regarding possibilities for resolving the case, planning discovery, and other matters. Are there time(s) this or next week that would work well for such a conference by phone? I'll endeavor to accommodate your availability.

I understand that LRCP 16.1(d) and FRCP 26(f)(3) require us to develop and file a joint scheduling statement. As the Court has not yet issued a scheduling order or scheduled a conference for that, I'd suggest we hold off on the joint scheduling statement for now.

Kind Regards,
Mike Bush